

KENTUCKY TITLE I COMPARABILITY GUIDE

2003-04 School Year

**Kentucky Department of Education
Division of Federal Programs and Instructional Equity**

502-564-3791

TABLE OF CONTENTS

I.	Introduction	2
II.	Requirements of the Title I Law and	3
III.	Form 1000A - General Information	4
IV.	Form 1000B - Comparability Comparison Using Student/Staff Ratio	9
V.	Completing Form 1000B When All Schools Have Title I Services	14
VII.	Form 1000C - Comparability Comparison Using Instructional Staff Salaries	16
VIII.	Dates, Records, and Action to be taken in Comparability Reporting	22

I. INTRODUCTION

Section 1120A of Title I of the *No Child Left Behind Act of 2001* states that a district may receive Title I, Part A funds only if State and local funds will be used in schools served by Title I to provide services, that, taken as a whole, are at least comparable to services in schools that are not receiving Title I funds. Title I schools must receive comparable services without taking into account Title I funds allocated, so that **all children are receiving essentially the same per pupil expenditures from state and local funds**. Schools receiving Title I services must be comparable to non-Title I schools. When all schools are served by Title I, their state and locally funded services must be comparable to each other. Comparability procedures must be implemented annually.

The comparability requirement does NOT apply to a district that has only one building for each grade span. A district may exclude schools with 100 or fewer students from its comparability determinations.

This guidebook has been developed to assist the local district in completing its comparability report. The guidebook begins by discussing what the law requires about comparability. It then describes ways comparability may be documented.

Complete the comparability report by December 17, 2003. Keep the forms and backup data on file in the district Title I office to be checked by auditors. If you have questions as you complete the forms, or if the schools in your district are not comparable after you have completed the appropriate forms, please call Diane Robertson, Lida Craft, Debbie Hicks, Mary Marshall, Robert Simpson, Ava Taylor or Joe Whitworth for assistance at (502) 564-3791.

II. REQUIREMENTS OF TITLE I, Part A

Public Law 107-110, Section 1120A

A district may receive Title I funds only if it uses state and local funds to provide services in Title I schools that are at least comparable to the services provided in non-Title I schools. If the district serves all of its schools (or all of its schools in a grade span or size grouping) with Title I funds, the district must use state and local funds to provide services that are comparable in each school. Comparability procedures must be implemented annually.

The comparability requirement does NOT apply to a district that has only one building for each grade span. A district may exclude schools with 100 or fewer students from its comparability determinations.

Title I requires that each district give written assurances that schools within the district receive comparable services from state and local funds. These assurances state that the district must meet the comparability requirements by establishing and implementing a:

- (a) Districtwide salary schedule;
- (b) Policy to ensure equivalence among schools in teachers, administrators, and other staff; **and**
- (c) Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

The comparability forms determine compliance with comparability. If the district has more than one school in a grade span, it must complete the general information section of the comparability report (Form 1000A). If the general information section (Form 1000A) indicates that a study must be completed, the district has the option of documenting compliance by utilizing **one** of the following two ways:

- (1) Using Form 1000B, compare the average number of students per instructional staff in each Title I school with the average number of students per instructional staff in non-Title I schools. A Title I school is comparable if its average does not exceed 110 percent of the average of non-Title I schools. If all schools in a grade span or size grouping are served by Title I, higher poverty schools are compared to lower poverty schools.

OR

- (2) Using Form 1000C, compare the average instructional staff salary expenditure per student in each Title I school with the average instructional staff salary expenditure per student in non-Title I schools. A Title I school is comparable if its average is at least 90 percent of the average of non-Title I schools. If all schools in a grade span or size grouping are served by Title I, higher poverty schools are compared to lower poverty schools.

This guide contains both forms. Since Form 1000B is by far the easier of the two forms to complete, it is suggested that Form 1000C (Instructional Staff Salaries) be completed **only** if comparability cannot be shown using Form 1000B (Student/Staff Ratio). In that case the district may want to complete Form 1000C before moving or adding staff to make the schools comparable. Call a consultant at (502) 564-3791 if the report shows the schools in the district are not comparable or if you have questions.

III. FORM 1000A

GENERAL INFORMATION TO DOCUMENT COMPARABILITY

The purpose of this form is to determine whether or not a detailed comparability study using Form 1000B must be completed, and, if so, the number of such reports required.

INSTRUCTIONS FOR COMPLETING FORM 1000A

- STEP 1: Give the name of the district and the person responsible for completing the comparability study. Give the date the data was established. The information for the comparability study must be taken on the last day of the second school month (a school month is twenty teaching days) or another date early in the school year (on or before November 30, 2003).
- STEP 2: Group schools according to grade span. **(Data from a school with an enrollment of 100 or fewer children is not required.)** Although there is no limitation on the number of grade spans a district may use, the number should match the basic organization of schools in the district. Usually there are three groups – (1) elementary, (2) middle or junior high, and (3) senior high. **Every school with an enrollment over 100 must be assigned to one of the groups.** However, a fourth or "X" group is permitted for schools with eight or more grades above kindergarten.

Follow these rules in grouping schools:

- (a) A school serving grades in two or three of the grade span groupings is to be included in that group with which it has the greatest number of grades in common.
- (b) A school that serves an equal number of grades in two or more grade span groupings is to be included in the lower grade span grouping.
- (c) An additional group ("X" group) is permitted for schools with eight or more grades above kindergarten.

- STEP 3: If there is a significant difference in the enrollments of schools within a grade span—for example, the largest school in the grade span has an enrollment that is two times the enrollment of the smallest school in the grade span—the district may divide grade spans into a smaller size grouping and a larger size grouping. *(See example A on page 6.)*

Example A on page 6 shows that if there are Title I and non-Title I schools in the same grade span or size grouping, then a detailed comparability study must be completed. The study (using Form 1000B) will compare the Title I schools to the non-Title I schools within the grade span or size grouping.

Example B on page 7 shows that if there is more than one school in a grade span or size grouping and all are being served by Title I, a detailed comparability study must be completed. The study (using Form 1000B) will compare the higher poverty Title I schools to lower poverty Title I comparison schools within the grade span or size grouping.

- STEP 4: If it has been determined from Form 1000A that a further comparability study has to be completed, Parts IV and V of this guide explain the procedures to complete Form 1000B. A study must be completed if there is more than one school in a grade span or size grouping. **Use a separate Form 1000B for each grade span or size grouping containing more than one school.** Do not use Form 1000C unless you cannot show that the schools are comparable using Form 1000B. Part VI of the guide explains the procedures to complete Form 1000C if it is needed.

NOTE: *A further comparability study using Form 1000 B will be completed only if Title I schools can be compared to each other (in Column 3) or with non-Title I schools (in Column 4). No study will be made across grade spans or size groupings. (See example C on page 8.)*

TITLE I COMPARABILITY REPORT FOR 2003-04

General Information to Document Comparability

Keep this form and backup date on file in the district Title I office.

District Name

Date Form Completed

Responsible Official

Signature

Printed Name

Effective Date of Report: Date of this report reflects project and enrollment status of this district's public schools as of (check appropriate date):

Last day of second school month,

Another date early in the school year (on or before 11-30-03),

PUBLIC SCHOOLS ENROLLING MORE THAN 100 CHILDREN

Note: If a grade span is not divided into size groups, enter all schools as "smaller."

Grade Spans (Example: A=P-5) (1)	Enrollment Size Grouping (2)	Number of Schools	
		Title I (3)	Non-Title I (4)
A=	Smaller		
	Larger		
B=	Smaller		
	Larger		
C=	Smaller		
	Larger		
X=	Smaller		
	Larger		
TOTALS			

Please answer the following to determine if a comparability study (Form 1000B) needs to be completed:

1. In each grade span or size grouping, is there more than one school in Column 3 (or in Column 3 and 4 together)?
☐ Yes ☐ No
2. If no, this is the only form to be completed. This form should be filed in the district Title I office.
3. If yes for any grade span or size grouping, Form 1000B will need to be completed for each grade span or size grouping that contains more than one school (in Column 3 or Columns 3 and 4 together).

TITLE I COMPARABILITY REPORT FOR 2003-04
General Information to Document Comparability

District Name Kentucky County

Date Form Completed December 2, 2003

Responsible Official

Signature

Henry Jones

Printed Name

Effective Date of Report: Date of this report reflects project and enrollment status of this district's public schools as of (check appropriate date):

☒ Last day of second school month, October 10, 2003 (This date will vary from district to district.)

Another date early in the school year (on or before 11-30-03),

PUBLIC SCHOOLS ENROLLING MORE THAN 100 CHILDREN

Note: If a grade span is not divided into size groups, enter all schools as "smaller."

Grade Spans (Example: A=P-5) (1)	Enrollment Size Grouping (2)	Number of Schools	
		Title I (3)	Non-Title I (4)
A=P-5	Smaller 125	1	
	Larger 409-682	5	3
B=6-8	Smaller		1
	Larger		
C=9-12	Smaller		1
	Larger		
X=	Smaller		
	Larger		
TOTALS		6	5

In this example, a study must be made to compare the Title I schools to the non-Title I schools within the larger size grouping. Note that a small school was pulled out and put in the smaller size grouping, and no study is necessary for the smaller size grouping. Form 1000B must be completed to determine if the schools in the larger size grouping are comparable. Example D on page 13 shows the completed Form 1000B for the schools in the larger size grouping.

TITLE I COMPARABILITY REPORT FOR 2003-04
General Information to Document Comparability

District Name Kera County

Date Form Completed December 2, 2003

Responsible Official

Signature

Jim Henry

Printed Name

Effective Date of Report: Date of this report reflects project and enrollment status of this district's public schools as of (check appropriate date):

☒ Last day of second school month, October 17, 2003 (This date will vary from district to district.)

Another date early in the school year (on or before 11-30-03),

PUBLIC SCHOOLS ENROLLING MORE THAN 100 CHILDREN

Note: If a grade span is not divided into size groups, enter all schools as "smaller."

Grade Spans (Example: A=P-5) (1)	Enrollment Size Grouping (2)	Number of Schools	
		Title I (3)	Non-Title I (4)
A=P-5	Smaller	8	
	Larger		
B=6-8	Smaller 225	1	
	Larger 575	1	
C=9-12	Smaller		1
	Larger		
X=	Smaller		
	Larger		
TOTALS		10	1

In this example, a study must be made to compare the Title I schools in the P-5 grade span to each other. Size grouping was not used since the P-5 schools are similar in enrollment. Form 1000B must be completed to determine if the schools in the P-5 grade span are comparable. No study is necessary for the 6-8 grade span (one small school and one large school) because there are no schools to be compared within the size groupings. Example E on page 15 shows the completed Form 1000B when all the schools in the grade span or size grouping are served by Title I.

TITLE I COMPARABILITY REPORT FOR 2003-04
General Information to Document Comparability

District Name Thoroughbred County

Date Form Completed December 2, 2003

Responsible Official

Signature

Henrietta Sims

Printed Name

Effective Date of Report: Date of this report reflects project and enrollment status of this district's public schools as of (check appropriate date):

☒ Last day of second school month, October 24, 2003 (This date will vary from district to district.)

Another date early in the school year (on or before 11-30-03),

PUBLIC SCHOOLS ENROLLING MORE THAN 100 CHILDREN

Note: If a grade span is not divided into size groups, enter all schools as "smaller."

Grade Spans (Example: A=P-5) (1)	Enrollment Size Grouping (2)	Number of Schools	
		Title I (3)	Non-Title I (4)
A=P-5	Smaller 450	1	
	Larger 925		1
B=6-8	Smaller 200	1	
	Larger 450	1	
C=9-12	Smaller 300		1
	Larger 600		1
X=	Smaller		
	Larger		
TOTALS		3	3

In this example, no study is necessary. There are no schools to be compared in grade spans or size groupings. Do not complete any other forms. Stop here and file this form in the district Title I office.

IV. FORM 1000B

COMPARABILITY COMPARISON USING STUDENT/STAFF RATIO

If Form 1000A indicates that a detailed comparability study is needed, it is recommended that Form 1000B be used. On Form 1000B, the student/staff ratio in each Title I school is compared with the student/staff ratio in non-Title I schools. If all schools in a grade span or size grouping have Title I services, the higher poverty schools are compared to the lower poverty schools.

NOTE: *If all schools in a grade span or size grouping are served by Title I, first read this part (Part IV), then follow the instructions in Part V, beginning on page 14.*

F.T.E. (Full-Time Equivalency) Staff

When calculating instructional staff, be consistent from building to building and for Title I and non-Title I schools alike. Itinerant staff must be prorated as necessary (e.g., if the music teacher serves more than one school, the music teacher's F.T.E. is less than full-time in each school).

Instructional Staff To Be Included

State and locally funded instructional staff members **assigned to the school** who provide instruction to children or who assist or supervise those staff members who provide instruction must be included for comparability purposes. This includes state and locally funded teachers, principals, librarians, guidance personnel, and paraprofessionals who are employed to assist other instructional staff members providing instructional service. (Secretaries, clerical personnel and cafeteria workers are not included.)

Instructional Staff To Be Excluded

The following instructional staff must be excluded from comparability purposes:

- Instructional staff paid from **any** federal funds (Title I funded teachers and instructional assistants, Title II funded teachers to reduce class size, etc.);
- Instructional staff paid from state and local funds for language instruction educational programs;
- Instructional staff paid from state and local funds for excess costs of providing services to children with disabilities as determined by the district; and
- Instructional staff paid from supplemental state and local funds for a program that meets the schoolwide program requirements of section 1114 or targeted assistance school requirements of section 1115. These programs must be in compliance with the requirements of a schoolwide program or a targeted assistance school.

A program funded from supplemental state or local funds meets the schoolwide program requirements of section 1114 if it—

- Is implemented in a school that meets the Title I schoolwide program poverty threshold (40% low-income);
- Is designed to upgrade the entire educational program in the school to enable all children to meet the state's challenging student performance standards;
- Is designed to meet the educational needs of all children in the school, particularly the needs of children who are failing, or most at risk of failing, to meet the state's student performance standards;
- Uses the state's system of assessment to review the effectiveness of the program.

A program funded from supplemental state or local funds meets the targeted assistance school requirements of section 1115 if it—

- Serves only children who are failing, or most at risk of failing, to meet the state's student performance standards;
- Provides supplemental services designed to meet the special educational needs of children who are participating in the program to enable those children to meet the state's student performance standards;
- Uses the state's system of assessment to review the effectiveness of the program.

INSTRUCTIONS FOR COMPLETING FORM 1000B

A separate Form 1000B must be completed for each grade span or size grouping containing more than one school.

STEP 1: At the top of the form, identify the name of the district.

STEP 2: Identify which grade span is compared on the form (e.g., P-5 would be on one sheet). If the district splits this grade span by size of enrollment, then mark the form to indicate which group (smaller or larger) is described on the sheet. If the grade span is not split into size groups, mark "smaller."

NOTE: *If the district splits the grade span into size of enrollment, one Form 1000B is completed for the smaller size group and another (separate) Form 1000B is completed for the larger size group.*

STEP 3: List all the schools that are Title I schools in Column 1 and give the actual grade span in Column 2.

STEP 4: In Column 3, list the enrollment of each Title I school at the date the study is taken.

NOTE: *Kindergarten students who attend school for half of the day should be counted as half-time students for enrollment purposes (.5 X 50 = 25). Preschool students should not be included in the enrollment.*

STEP 5: In Column 4 give the number of state and locally funded instructional staff Full-time Equivalency (F.T.E.) at each Title I school. (See previous page for instructional staff to be included and excluded in calculations.)

In the example below, the total state and locally funded instructional staff F.T.E. for Pontiac Elementary School is 21.10. *Note that the itinerant teachers have been prorated.* School staff information for each school must be on file in the district Title I office. The breakdown is as follows for Pontiac Elementary.

State and Locally Funded Instructional Staff	F.T.E. (Full-Time Equivalency)
1 Principal	1.00 F.T.E.
16 Regular Classroom Teachers	16.00 F.T.E.
1 Music Teacher	.33 F.T.E.
1 Art Teacher	.33 F.T.E.
1 P.E. Teacher	.33 F.T.E.
1 School Nurse	.11 F.T.E.
1 Counselor	1.00 F.T.E.
2 Full-time Teacher Aides	2.00 F.T.E.
BUILDING F.T.E. TOTAL	21.10 F.T.E.

NOTE: *If a school council has reduced the school's instructional staff, the school must continue to receive the same amount of state or local funds. List the number of staff in Column 4 that would have been at the school. Put an ★ next to the number and at the bottom of the form, describe the change made by the council.*

STEP 6: Title I school calculations are computed individually by dividing Column 3 by Column 4 and listing the student/staff ratio in Column 5.

- STEP 7: List the non-Title I schools at the bottom of the page in the comparison group. Give the total enrollment of students in the comparison schools and the total number of F.T.E. staff at the comparison schools.
- STEP 8: The comparison schools' average (Box 5A) is computed by dividing the total enrollment by the total F.T.E. staff. Box 5B is the result of multiplying 110% times Box 5A.
- STEP 9: If the student/staff ratio of any Title I served school exceeds the figure in Box 5B, put an "X" in Column 6 to show that the building is **not** comparable.

In Example D (Form 1000B) on page 13, the Title I schools' student/staff ratios in Column 5 do **not** exceed 24.43 (Box 5B). Therefore, all schools in the example are considered comparable.

- STEP 10: If all the schools are comparable, file Forms 1000A and 1000B in the district Title I office.

NOTE: *If any of the schools are not comparable using student/staff ratio, call a consultant at 502-564-3791 for further guidance. After talking with the consultant, you may want to complete Form 1000C to determine if the schools are comparable using instructional staff salaries before adding or moving staff.*

TITLE I COMPARABILITY REPORT FOR 2003-04

Detailed School Data Using Student/Staff Ratio

Keep this form and backup data on file in the district Title I office.

District Name _____

Use a separate Form 1000B for each grade span or size grouping containing more than one school (from Form 1000A).

This sheet is only for grade span _____ with enrollment group either () smaller or () larger.

Name of Title I Schools (1)	Actual Grade Span (2)	Students Enrolled (3)	F.T.E. Staff (4) *	Student/Staff Ratio Column 3 ÷ 4 (5)	Not Comparable (6)

COMPARISON SCHOOLS

List the comparison schools included in this average.	Total Enrolled	Total F.T.E. Staff	Average (5A)
	Enter 110% of Average 1.10 X (5A)		(5B)

The comparison schools are either the non-Title I schools or the lower poverty Title I schools (if all of the schools in the grade span or size grouping are served by Title I).

- ★ ***If a school council has reduced the school's staff, the school must continue to receive the same amount of state or local funds. List the number of staff in Column 4 that would have been at the school and describe the change made by the Council:***

The schools are comparable if the student/staff ratio of each Title I school (in Column 5) does not exceed the figure in Box 5B. File this form in the district Title I office.

If the student/staff ratio of any Title I school (in Column 5) exceeds the figure in Box 5B, the school is not comparable. Call a consultant at (502) 564-3791 for further guidance.

TITLE I COMPARABILITY REPORT FOR 2003-04
Detailed School Data Using Student/Staff Ratio

District Name Kentucky County

Use a separate Form 1000B for each grade span or size grouping containing more than one school (from Form 1000A).

This sheet is only for grade span P-5 with enrollment group either () smaller or (X) larger.

Name of Title I Schools (1)	Actual Grade Span (2)	Students Enrolled (3)	F.T.E. Staff (4)	Student/Staff Ratio Column 3 ÷ 4 (5)	Not Comparable (6)
Pontiac Elementary	P-5	409	21.10	19.38	
Cadillac Elementary	P-6	409	18.10	22.60	
Thunderbird Elementary	P-6	424	20.80	20.38	
Ford Elementary	P-5	412	18.70	22.03	
Mustang Elementary	P-7	682	29.52	23.10	

COMPARISON SCHOOLS

List the comparison schools included in this average.	Total Enrolled	Total F.T.E. Staff	Average (5A)
Camaro Elementary	1,344	60.51	22.21
Pinto Elementary			
Corvette Elementary	Enter 110% of Average 1.10 X (5A) 22.21		(5B) 24.43

This example determines if the schools in the larger size grouping from Example A on page 6 are comparable. The schools used as comparison schools in this example are non-Title I schools. All schools in this example are comparable because the student/staff ratio for each Title I school (in Column 5) does not exceed the figure in Box 5B. File this form in the district Title I office.

V. COMPLETING FORM 1000B WHEN ALL SCHOOLS HAVE TITLE I SERVICES

If all of a district's schools in a grade span or size grouping have Title I services, then the district is obligated to demonstrate that state and local services, taken as a whole, are comparable in each school. In order to do this, the district must identify some buildings as "Title I" schools and some as comparison schools.

Use the following format in doing this:

STEP 1: The **higher poverty** schools are to be identified as the "Title I" schools and should be listed in Column 1 **at the top of the page**.

STEP 2: Those Title I schools with the **lowest percent** of children from low-income families are to be identified as the **comparison schools**. **This group of comparison schools may not include more than one-half of all schools in that grade span or grouping.**

STEP 3: The following describes the process used to complete Example E (Form 1000B) on page 15:

- (a) The grade span is P-5.
- (b) The district will not split by size grouping. (Therefore, the smaller size grouping is marked.)
- (c) There are eight elementary buildings -- all are served by Title I.
- (d) The percent of children from low-income families must be identified to determine which buildings will act as the comparison schools. Using the data available on the *Title I Ranking Report for 2003-04*, identify those schools from the group with the lowest percent of low-income children.

Example

Name of School	Percent of Low-Income
Red Elementary	40
White Elementary	38
Black Elementary	35
Green Elementary	34
Orange Elementary	30
Yellow Elementary	29
Blue Elementary	27
Pink Elementary	25

STEP 4: Since there are eight schools, up to four of them (one-half) may be placed at the bottom of the page as the Comparison Schools. For the example, only three schools will be used as Comparison Schools: Yellow Elementary (29%), Blue Elementary (27%) and Pink Elementary (25%).

STEP 5: To complete Columns 3, 4 and 5, the instructions are identical to those provided in the instructions in Part IV for comparing Title I schools to non-Title I schools, using student/staff ratio (Form 1000B).

TITLE I COMPARABILITY REPORT FOR 2003-04
Detailed School Data Using Student/Staff Ratio

District Name Kera County

Use a separate Form 1000B for each grade span or size grouping containing more than one school (from Form 1000A).

This sheet is only for grade span P-5 with enrollment group either (X) smaller or () larger.

Name of Title I Schools (1)	Actual Grade Span (2)	Students Enrolled (3)	F.T.E. Staff (4)	Student/Staff Ratio Column 3 ÷ 4 (5)	Not Comparable (6)
Red Elementary	P-5	409	21.10	19.38	
White Elementary	P-6	409	18.10	22.60	
Black Elementary	P-6	424	20.80	20.38	
Green Elementary	P-5	412	18.70	22.03	
Orange Elementary	P-7	682	29.52	23.10	

COMPARISON SCHOOLS

List the comparison schools included in this average.	Total Enrolled	Total F.T.E. Staff	Average (5A)
Yellow Elementary	1,344	60.51	22.21
Blue Elementary			
Pink Elementary	Enter 110% of Average 1.10 X (5A) 22.21		(5B) 24.43

The Title I schools with the lowest percent of free and reduced lunch count must be used as the Comparison Schools if all schools in the grade span or size grouping are served by Title I. All schools in this example are comparable because the student/staff ratio for each Title I school (in Column 5) does not exceed the figure in Box 5B. File this form in the district Title I office.

VI. FORM 1000C

COMPARABILITY COMPARISON USING INSTRUCTIONAL STAFF SALARIES

Do not use this comparison unless schools were not comparable using Form 1000B. Contact a Title Programs consultant before using this form. If all schools in a grade span or size group are served by Title I, read this part (Part VI); then follow instructions in Part V for comparison schools.

This section explains the procedures for completing Form 1000C when comparing the instructional staff salary expenditure per student in each Title I school with the instructional staff salary expenditure per student in schools not participating in Title I.

Salaries (Excluding Longevity)

When calculating instructional staff salaries, be consistent from building to building and Title I and non-Title I schools alike. Be sure to prorate salaries as necessary (e.g., if a music teacher is .5 F.T.E. in one elementary and .5 F.T.E. in another elementary, the salary identified for each building should only reflect that portion of the teacher's time assigned in a particular school). Salaries used for comparability purposes are to exclude longevity (i.e., length of service). Therefore, base salary for job classification should be used - **NOT current salary**. The district should distinguish various levels of base salaries (e.g., teachers with a bachelor's degree would have one base salary; teachers with master's degree would have a higher base salary).

Staff To Be Included

The salaries of **state and locally funded** instructional staff members **assigned to the school** who provide instruction to children or who assist or supervise those staff members who provide instruction must be included for comparability purposes. This includes state and locally funded teachers, principals, librarians, guidance personnel, and paraprofessionals who are employed to assist other instructional staff members providing instructional service. (Secretaries, clerical personnel and cafeteria workers are not included.)

Staff To Be Excluded

The salaries of the following staff must be excluded from comparability purposes:

- Instructional staff paid from **any** federal funds (Title I funded teachers and instructional assistants, Title II funded teachers to reduce class size, etc.);
- Instructional staff paid from state and local funds for language instruction educational programs;
- Instructional staff paid from state and local funds for excess costs of providing services to children with disabilities as determined by the district; and
- Instructional staff paid from supplemental state and local funds for a program that meets the schoolwide program requirements of section 1114 or targeted assistance school requirements of section 1115. These programs must be in compliance with the requirements of a schoolwide program or a targeted assistance school.

A program funded from supplemental state or local funds meets the schoolwide program requirements of section 1114 if it--

- Is implemented in a school that meets the Title I schoolwide program poverty threshold (40% low-income);
- Is designed to upgrade the entire educational program in the school to enable all children to meet the state's challenging student performance standards;
- Is designed to meet the educational needs of all children in the school, particularly the needs of children who are failing, or most at risk of failing, to meet the state's student performance standards;
- Uses the state's system of assessment to review the effectiveness of the program.

A program funded from supplemental state or local funds meets the targeted assistance school requirements of section 1115 if it--

- Serves only children who are failing, or most at risk of failing, to meet the state's student performance standards;
- Provides supplementary services designed to meet the special educational needs of children who are participating in the program to enable those children to meet the state's student performance standards;
- Uses the state's system of assessment to review the effectiveness of the program.

INSTRUCTIONS FOR COMPLETING FORM 1000C

Do not use this form unless schools were not comparable using Form 1000B. Contact a Title Programs consultant before using this form. A separate Form 1000C must be completed for each grade span or size grouping containing more than one school.

STEP 1: At the top of the form, identify the name of the district.

STEP 2: Identify which grade span is compared on the form (e.g., P-5 would be on one sheet). If the district splits this grade span by size of enrollment, then mark the form to indicate which group ("smaller" or "larger") is described on this form.

STEP 3: List all the schools that are Title I schools in Column 1 and give the grade spans in Column 2.

STEP 4: In Column 3 list the enrollment of each Title I school at the date the comparability study is taken.

NOTE: *Kindergarten students who attend school for half of the day should be counted as half-time students for enrollment purposes (.5 X 50 = 25). Preschool students should not be included in the enrollment.*

STEP 5: In Column 4 give the total salaries excluding longevity at each Title I school. (See previous page for determining staff to be included and excluded in calculations.)

For each Title I school, the district compiles the total salary expenditure by building. In Example F (Form 1000C) on page 20, the total staff F.T.E. for Pontiac Elementary School equals \$376,298. The breakdown for the total is:

Staff	Base Salary Per Classification	Total Salary (Prorated)
1 Principal	\$25,000	\$25,000
10 Regular Classroom Teachers (Master's)	\$20,000	\$200,000
6 Regular Classroom Teachers (Bachelor's)	\$18,000	\$108,000
1 Music Teacher (.333 F.T.E.)	\$20,000	\$6,660
1 Art Teacher (.333 F.T.E.)	\$20,000	\$6,660
1 P.E. Teacher (.333 F.T.E.)	\$18,000	\$5,994
1 School Nurse (.11 F.T.E.)	\$15,000	\$1,650
1 Counselor	\$8,000	\$8,000
2 Full-time Paraprofessional Aides	\$7,167	\$14,334
BUILDING F.T.E. TOTAL		\$376,298

STEP 6: Title I school calculations are computed individually by dividing Column 4 by Column 3 and listing the average per pupil expenditure in Column 5.

STEP 7: List the comparison schools at the bottom of the page. Give the total enrollment of students in comparison schools and the total salaries at the comparison schools.

STEP 8: The comparison schools' average per pupil expenditure is computed by dividing the total salaries by the total enrolled. This computation (Box 5A) results in the average per pupil expenditure for the non-Title I schools. To complete Box 5B, enter 90% of Box 5A.

STEP 9: If the average per pupil expenditure for any Title I served school is less than the figure in Box B, put an "X" in Column 6 to show that the building is not comparable. In Example F (Form 1000C) on page 20, the Title I schools' average per pupil expenditure in Column 5 exceeds \$766.63 (Box 5B). Therefore, all schools in the examples are considered comparable.

NOTE: *Example G on page 21 shows how to do the comparison if all of the schools in a grade span or size grouping are served by Title I.*

STEP 10: If all the schools are comparable, file Forms 1000A and 1000C in the district Title I office.

NOTE: *If any school is not comparable using a comparison of instructional staff salaries, call a Title Programs consultant at (502) 564-3791 for further guidance. If any school is not comparable, staff will have to be added or moved in order to make the schools comparable.*

TITLE I COMPARABILITY REPORT FOR 2003-04

Detailed School Data Using Instructional Staff Salaries

Do not use this form unless schools were not comparable using Form 1000B. Call a Title Programs consultant before using this form. Keep this form and backup data on file in the district Title I office.

District Name _____

Use a separate Form 1000C for each grade span or size grouping containing more than one school (from Form 1000A).

This sheet is only for grade span _____ with enrollment group either () smaller or () larger.

Name of Title I Schools (1)	Actual Grade Span (2)	Students Enrolled (3)	Salaries Excluding Longevity (4)	Average Per Pupil Expenditure Column 4 ÷ 3 (5)	Not Comparable (6)

COMPARISON SCHOOLS

List the comparison schools included in this average.	Total Enrolled	Total Salaries	Average (5A)
	Enter 90% of Average .90 X (5A)		(5B)

If any school is still not comparable after using this form, staff will need to be moved or added to make the school comparable. Call a Title Programs consultant at (502) 564-3791 for guidance.

TITLE I COMPARABILITY REPORT FOR 2003-04
Detailed School Data Using Instructional Staff Salaries

District Name Kentucky County

Use a separate Form 1000C for each grade span or size grouping containing more than one school (from Form 1000A).

This sheet is only for grade span P-5 with enrollment group either () smaller or (X) larger.

Name of Title I Schools (1)	Actual Grade Span (2)	Students Enrolled (3)	Salaries Excluding Longevity (4)	Average Per Pupil Expenditure Column 4 ÷ 3 (5)	Not Comparable (6)
Pontiac Elementary	P-5	409	\$376,298	920.04	
Cadillac Elementary	P-6	409	\$343,400	839.61	
Thunderbird Elementary	P-6	474	\$396,738	837.00	
Ford Elementary	P-5	412	\$360,269	874.44	
Mustang Elementary	P-7	682	\$566,961	831.32	

COMPARISON SCHOOLS

List the comparison schools included in this average.	Total Enrolled	Total Salaries	Average (5A)
Camaro Elementary	1,344	\$1,144,833	851.81
Pinto Elementary			
Corvette Elementary	Enter 90% of Average .90 X (5A) 851.81		(5B) 766.63

This example determines if the schools in the larger size grouping from Example A on page 6 are comparable using staff salaries instead of staff/student ratio. The comparison schools in this example are non-Title I schools. All schools in this example are comparable because the average per pupil expenditure for each school (in Column 5) exceeds the amount in Box 5B.

TITLE I COMPARABILITY REPORT FOR 2003-04
Detailed School Data Using Instructional Staff Salaries

District Name Kera County

Use a separate Form 1000C for each grade span or size grouping containing more than one school (from Form 1000A).

This sheet is only for grade span P-5 with enrollment group either (☒) smaller or (☐) larger.

Name of Title 1 Schools (1)	Actual Grade Span (2)	Students Enrolled (3)	Salaries Excluding Longevity (4)	Average Per Pupil Expenditure Column 4 ÷ 3 (5)	Not Comparable (6)
Red Elementary	P-5	409	\$376,298	920.04	
White Elementary	P-6	409	\$343,400	839.61	
Black Elementary	P-6	474	\$396,738	837.00	
Green Elementary	P-5	412	\$360,269	874.44	
Orange Elementary	P-7	682	\$566,961	831.32	

COMPARISON SCHOOLS

List the comparison schools included in this average.	Total Enrolled	Total Salaries	Average (5A)
Yellow Elementary	1,344	\$1,144,833	851.81
Blue Elementary			
Pink Elementary	Enter 90% of Average .90 X (5A) 851.81		(5B) 766.63

This example determines if the schools in the smaller size grouping from Example B on page 7 are comparable using staff salaries instead of staff/student ratio. The Title I schools with the lowest percentage of free and reduced lunch count must be used as the comparison schools when all of the schools in the grade span or size grouping are served by Title I. All schools in this example are comparable because the average per pupil expenditure for each school (in Column 5) exceeds the amount in Box 5 B.

VII. DATES, RECORDS, AND ACTION IN COMPARABILITY REPORTING

It is the district's responsibility to maintain appropriate records that verify that the comparability requirement is met. The form(s) should be completed by December 17, 2003. Keep the forms and backup data on file in the district Title I office.

A. District Comparability

1. The effective date of the comparability report should be the last day of the second school month or another date early in the school year (on or before 11-30-03). Data is to reflect the current year program at the date selected.
2. A district must be in compliance with comparability following the comparability study.

B. Information and Records on File in Local District

1. The district must have Form 1000A on file if there is more than one school in a grade span. The district must use Form 1000B if a further comparability study is required. Only use Form 1000C if schools are **not** comparable using Form 1000B. Call a consultant at (502) 564-3791 before using Form 1000C.
2. The completed forms must be available in the district Title I office for a district audit.
3. The district must have the working papers on file for each school. This includes the student/staff ratio or the salary information needed for the report.
4. Comparability records must be maintained in the district for three years or until any impending audit is settled.

C. Actions in Cases of Non-Comparability

1. If a district determines that schools are not comparable, records must be made available to show how the district has brought the schools into comparability. Call a consultant at (502) 564-3791 if the study shows that schools are not comparable. **Staff will need to be moved or added immediately in order to make the particular school(s) comparable.**
2. If during a district audit, a district is found **not** to be in compliance with the comparability requirements, the district must pay back the school that was not comparable. The amount of state and federal funds to be paid back to the school is determined by the percentage by which the school was not comparable.